



# HODSON BROADCASTING

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APR - 5 1999

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April 1, 1999

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Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.; TW-A325  
Washington, D.C. 20554

(MM Docket # 99-46 RM-9470)

Dear Ms. Salas:

Hodson Broadcasting respectfully submits the enclosed Comments for filing in support of the Commission's Notice of Proposed Rule Making (*DA 99-310*) concerning the allotment of FM Channel 291A (106.1 MHz) to Tecopa, California.

Pursuant to Sections 1.415(a), 1.419(a) and (b), 1.42(e), 1.49(a), and 1.52 of the Commission's Rules, please find enclosed two originals, plus four (4) copies of my company's Comments and associated exhibits which pertain to the above-mentioned proceeding. The second original also has this cover letter attached and is provided for a receipt copy that can be file-stamped and returned to my address noted above.

It is Hodson Broadcasting's continued intention to apply for a construction permit to operate on the requested channel if a favorable *Report and Order* is issued by the Commission modifying the FM Table of Allotments to reflect the addition of Channel 291A to the Tecopa area.

Thanks Magalie, for your attention and concern in this matter.

Very truly yours,

**Richard Dean Hodson**

Richard Dean Hodson, d/b/a/

Hodson Broadcasting

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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APR - 5 1999

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In the matter of

Amendment of 73.202(b),  
Table of Allotments,  
FM Broadcast Stations  
(Tecopa, CA)

MM Docket No. 99-46  
RM-9470

To: Chief, Allocations Branch  
Mass Media Bureau  
Policy and Rules Division

**COMMENTS**

Hodson Broadcasting, a sole proprietorship formed by Richard Dean Hodson (hereafter called "Hodson"), pursuant to Section 1.415(a) of the Commission's Rules, respectfully submits the following "Comments" in response to the *Notice of Proposed Rule Making* in the above-captioned proceeding.<sup>1</sup>

The *Notice* proposed to amend the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, by allocating FM Channel 291A to Tecopa, California, as that community's first local FM broadcast service, provided the issue of community status is resolved. The Commission adopted the *NPRM* in response to a Petition for Rule Making mailed by Hodson on December 1, 1998 and received as delivered at the Commission on December 4, 1998. Hodson continues to maintain serious interest in the allocation of Channel 291A to Tecopa, and will, upon the adoption of a *Report and Order* allocating Channel 291A, or any other equivalent and/or higher-class channel to Tecopa, file an application to construct and operate a new FM Broadcast station at Tecopa, California.

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<sup>1</sup>The *Notice* was released February 12, 1999 (DA 99-310). The *NPRM* specified "interested parties may file comments on or before April 5, 1999, and reply comments on or before April 20, 1999". Thus, the instant comments are timely filed.

After examining the Commission's *NPRM* and related case cites, it is evident that Hodson must provide documentation that Tecopa qualifies as a community for allotment purposes. In the *Notice*, the Commission extracts Hodson's listing of "verifiable community area" factors, and requested clarification as to the scope of such criteria and how they relate to Tecopa as a proposed allotment "community". Hodson recognizes the general categorization of attributes could easily imply Tecopa in specific; however, the "verifiable community area" reference does indeed include mentions of Shoshone and Tecopa Hot Springs, both of which are within a nine-mile radius of Tecopa proper and only five miles from the proposed transmitter site.<sup>2</sup> Hodson notes that the original "area" listing, as cited from Hodson's Petition, is not all-inclusive as well, and believes that if a complete analysis had been submitted previously, a community issue would most likely not be under consideration.

The Commission previously noted that Tecopa is not incorporated.<sup>3</sup> According to Tecopa resident and local information guru, Patricia Compton, Tecopa is a small town, privately-owned by John Zellhoefer. Several other longtime Tecopa residents echoed this belief concerning the Zellhoefer's prominence in the community. Hodson was not able to verify this privately-owned town theory, but through phone conversation with Tom Lanshaw, Inyo County Assessor, it was discovered that the Zellhoefer Trust does own considerable land in Tecopa, specifically 159 acres that includes the property on which Tecopa's business district lies, and an adjacent 0.11 acre plot that the Tecopa Post Office is founded upon. Dr. Howard W. Zellhoefer

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<sup>2</sup>A new transmitter site (coordinates: 35-35-58 NL; 116-16-28 WL @ 1492 feet AMSL) is proposed to be utilized (See Hodson Map Exhibit B, "Radio Facility" for plotted reference location and Photo Exhibit L for images of site proper.), superceding the proposed site selection originally mapped in Hodson's Engineering Statement filed with Petition of Rule Making. Any further discussion of this particular issue would undermine and distract from the instant community status concerns of Tecopa and would be better addressed, if the need be, during CP application proceedings.

<sup>3</sup>The Commission has established in various case precedents [See *Mercer Broadcasting Company*, 22 FCC 1009, 13 RR 891 (1957) and *Musical Heights, Inc.*, 29 FCC 1, 19 RR 49 (1960)] that incorporation is not a prerequisite to community status. *Seven Locks Broadcasting Co.*, 37 FCC 82, at 83, 84 (1964). footnote 1.

originally created his land trust 13 years ago. In 1997, Dr. Zellhoefer passed on and left this trust to his two sons, John and Allen. Allen Zellhoefer does not actively associate himself with this trust and has delegated primary responsibility of his father's property holdings to his brother John. John Zellhoefer has leasing arrangements with Pat Smith, owner of the Tecopa Trading Post, involving the land that Pat's general store is upon. Otherwise, there is not further evidence that the Zellhoefer trust or its beneficiaries "own" Tecopa. Hodson believes the Zellhoefers acquired "town ownership" status by default, due to the fact that their sizeable property holdings encompass Tecopa's downtown business district and Post Office. See Hodson's Standard Exhibit Q for related information provided by the Inyo County Assessor's Office.

The U.S. Census Bureau listed Tecopa in 1990 as having a population of 48 residents, contrary to the Commission's *NPRM* stating "Tecopa is not incorporated nor listed in the U.S. Census."<sup>4</sup> This information was obtained courtesy of the U.S. Census Bureau's Internet website ([www.census.gov](http://www.census.gov)) under US Place Search and is included for consideration within Hodson's supporting exhibits as Standard Exhibit I.

For the record, several businesses that call Tecopa their home include Tecopa-Francis Elementary School, Tecopa Library (County of Inyo), Tecopa Cemetery District, Tecopa Trading Post (General Store), Faith Community Church, Death Valley Chamber of Commerce, Death Valley Academy, Inyo County Community School, Laundromat (operated by Excalibur Laundries), Franklin Mining Corporation, Hodson Broadcasting, China Ranch Date Farm & Bakery, Southern Amargosa Ambulance Service, Southern Amargosa Translator Service, Delight's Hot Spa, Sugar Shack Trailer Park, Desert Outreach, and the Desert Cat Cafe, which recently commenced restaurant operations this year. Shoshone Indians (1<sup>st</sup> Nation) are refurbishing a defunct private hot springs resort and plan to open for business later this year under the name "Poo Ha Ba" Healing Center. Governmental entities are also not void of presence in the Tecopa community, with the United States Postal Service (ZIP 92389) serving this area for over a century. According to our local Postmaster and lifelong Tecopa resident,

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<sup>4</sup>*MM Docket No. 99-46, RM-9470. See Additional Information.*

Terri Stevenson, 270 post office boxes out of a total of 430 are currently being rented in Tecopa, and of them, over twenty are listed as businesses. In addition, Inyo County Parks & Recreation Department operates and maintains Tecopa Hot Springs Park and the Hurlbut-Rook Community Center, plus oversees the Tecopa Senior Program. The Inyo County Sheriff's Department supports a separate local phone number for Tecopa residents in need of assistance, although the physical substation is co-located with the Bureau of Land Management and California Department of Transportation maintenance facility just outside Shoshone. Regardless, the Commission has already determined that it does not require an area to provide every municipal service nor have an established minimum amount of commercial activity to be regarded as a community.<sup>5</sup> Tecopa is also home for the Southern Inyo Fire Protection District, which is headed by fire chief Hank Messer and comprised of Brian Brown, Jim Copland, Tim Liddell, Bruce Stevenson, and Susan Sorrells. This volunteer fire organization serves Tecopa, Tecopa Heights, Tecopa Hot Springs, Shoshone, and surrounding areas within Southern Inyo County, against fire and other related hazards. Civic and social entities in the Tecopa area include, but are not limited to, the Southeast Area Citizen's Advisory Committee, Parent-Teachers Association (PTA), Tecopa Seniors Club, Hostelling International, Alcoholics Anonymous, and the Rockhound Club.

To further assist the Commission in evaluating the status of Tecopa, Hodson has formulated a exhibit presentation including a table of contents. These exhibits are categorized by map, questionnaire, photo, and standard groupings for reference ease, with a brief title description and page number for each exhibit. Maps utilized include submissions produced by the United States Geological Survey (USGS) and the California State Automobile Association (AAA). The USGS maps are to scale, with the Tecopa Quadrangle ( Map Exhibit A: Page 1) merged with the adjacent Shoshone Quadrangle, before color copies were made, to present Tecopa centrally within this exhibit's document structure, opposed to along the quadrangle's edge, as originally mapped. Both AAA map exhibits are enlarged to help define various graphic details.

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<sup>5</sup>*Kenansville, Florida*, 5 FCC Rcd at 2664 (1990). paragraph 10 & footnote 2.; *Semora, North Carolina*, 5 FCC Rcd at 935.

A questionnaire was developed for local resident input and to provide an informal comment venue for Tecopa citizens, and is presented and summarized within its own exhibit heading. A thirteen-page photograph exhibit section has also been developed to assist the Commission's determination of Tecopa attributes. Each photo has its own reference number and each page within this section contains four related images with an overall category description. In the event only two or three images relate to that page's category description, an unrelated photo or two (for that page) may be included, as certain isolated images did not warrant an entire photographic exhibit page of its own. The standard exhibits section is straightforward and needs no further explanation. Descriptive captions, black arrow icons, and other helpful references aids have been utilized wherever possible to further simplify and clarify the overall exhibit section's presentation.

After reviewing the exhibits attached, various conclusions can be determined. The map exhibits depict Tecopa as an identifiable area plotted by different resources, one being the Department of the Interior, a government entity, through their USGS topographic offering. Another governmental agency, the United States Census Bureau, via their Internet website, recognizes Tecopa as a Census Designated Place (CDP). Although in times past, a Census listing was sufficient grounds to confer "community" status upon a questionable allotment, various Commission decisions have more recently suggested that a Census factor, by itself, may not be enough to determine a community basis.<sup>6</sup> Hodson would like to topically inject that the Census website information provided is based on 1990 figures, almost a decade ago, and doesn't currently reflect Tecopa's more accurate population as stated in Hodson's original Petition to the Commission. This outdated Census fact should easily be disproved throughout the exhibits section, especially when viewing any overview images of Tecopa and taking into consideration growth within the Tecopa area is evidenced by the recent opening of the Desert Cat Cafe and current refurbishing of a private hot springs by the 1<sup>st</sup> Nation Indians. Another example of Tecopa area growth became

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<sup>6</sup>*Mighty-Mac Broadcasting Co.*, 101 FCC 2d 303, 306 (1985). paragraph 5 & footnote 2.

apparent when Bruce Stevenson and Hodson were recently conversing about the local “scene”, and Mr. Stevenson reported to Hodson that the landing strip (near Shoshone) which services the Tecopa region, now averages three flights a week and is supported in Photo 3 (Photograph Exhibit J: Page 17) toward the center-left portion of the image, where an airborne plane is clearly visible over downtown Shoshone, just to the right of a street lamp post.

Direct resident testimony, both verbal and written, convince Hodson that probative evidence exists that Tecopa residents “function as a community around which their interests coalesce”.<sup>7</sup> Hodson’s questionnaire, although limited in respondents, demonstrates that Hodson must be concerned about Tecopa and its residents to ensure the public interest, convenience, and necessity was served, by allowing a venue voice for local citizens concerning their beliefs, views, and opinions regarding Tecopa being defined as a community. This same survey strongly supports an overwhelming discovery - Hodson could not find even *one* Tecopa resident, whether written or verbal, seasonal or permanent, that would declare Tecopa and community not interrelated. Coalescence of common interests is established by means of the natural Tecopa Hot Springs, which bonds and unites locals and travelers alike, whom desire the unique healing waters for medical, health, or general reasons. “Snowbirds” and retirees gather in the thousands to mutually enjoy the mild winter climate and economic living conditions between the months of September through April every year, and is further evidenced by the Senior Lunch Program congregation and the two “Tecopa fellowship” pictures hanging in the Tecopa Post Office ( See Photograph Exhibits G & D: Pages 14 & 11, respectively ). Dorothy Lehmann, owner of the Sugar Shack R.V. Park, stated to Hodson on March 23, 1999, that St. John the Baptist Catholic Church had over one hundred worshipers the previous Sunday, while Faith Community Church regularly has at least fifty service attendees. Many local residents refer to “the Heights” and “the Springs” because Tecopa is usually agreeably assumed. Several businesses incorporate “Tecopa” in their names, much like the Faith

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<sup>7</sup>*Beacon Broadcasting*, 2 FCC Rcd at 3469, 3471 (1987). paragraphs 3 & 11.

Community Church and Hurlbut-Rook Community Center utilize the verbiage "community" in their endemic titles.

Furthermore, Hodson believes various objective and subjective evidence clearly exists to associate Tecopa as a community, especially when viewed in its entirety. Following the Commission's guidelines, Hodson has provided proof of social, commercial, cultural, and religious organizations and services in or near Tecopa. Hodson has also included objective evidence, such as local business cards, receipts, and various commercial literature and bulletin board postings, plus convincing images depicting various Tecopa attributes, from the infamous natural hot springs to the usual offerings, such as post offices, schools, churches, libraries, airfields/landing strips, bulletin boards, signs, and general overview pictorials.

Based on the foregoing, Hodson prayerfully requests that this proposal be adopted and the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, be amended to include the new allotment of Channel 291A for the community of Tecopa, California.

Respectfully submitted,

RICHARD DEAN HODSON, d/b/a/  
HODSON BROADCASTING

*Richard Dean Hodson*

Hodson Broadcasting

P.O. Box 66

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April 1, 1999





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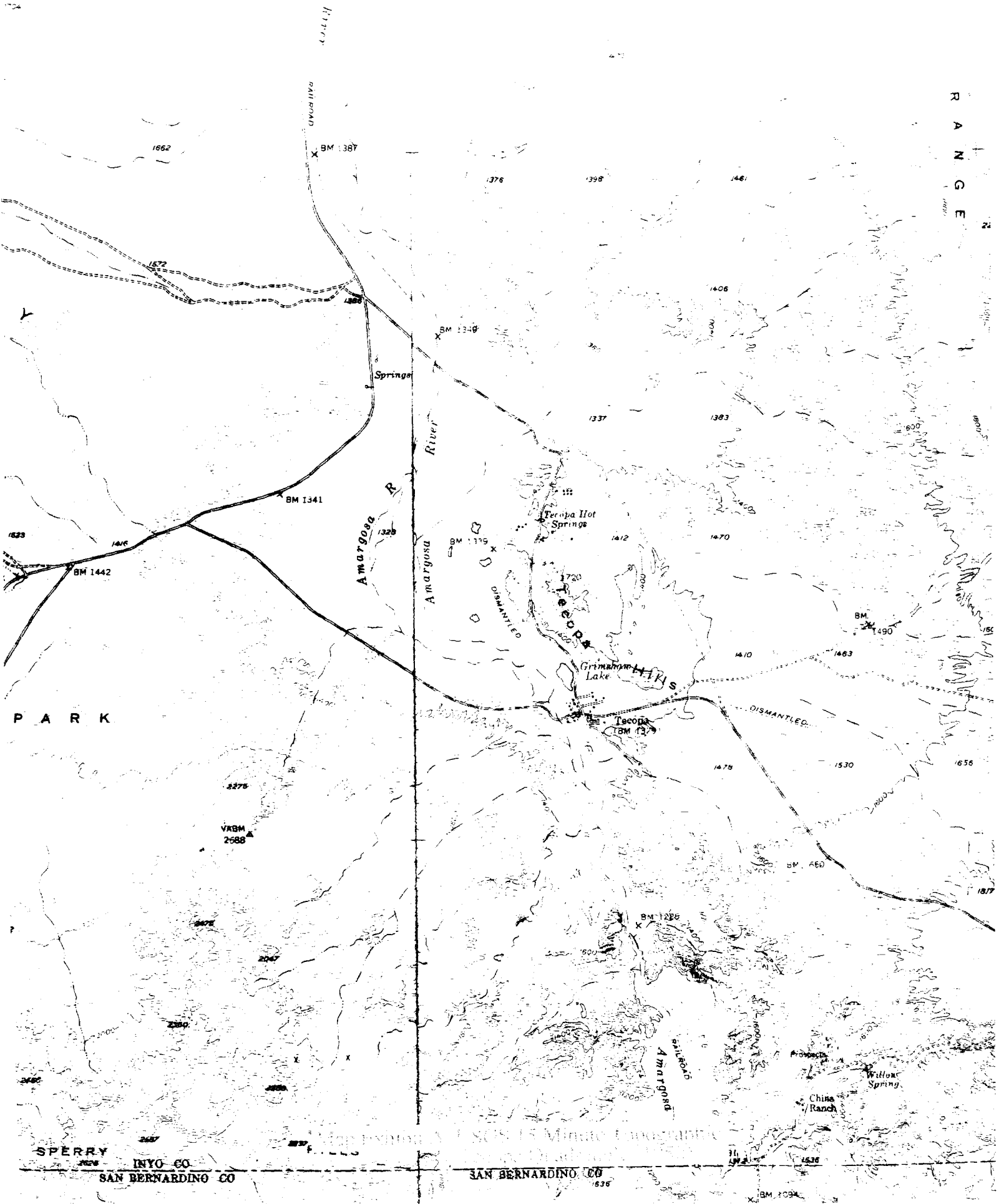
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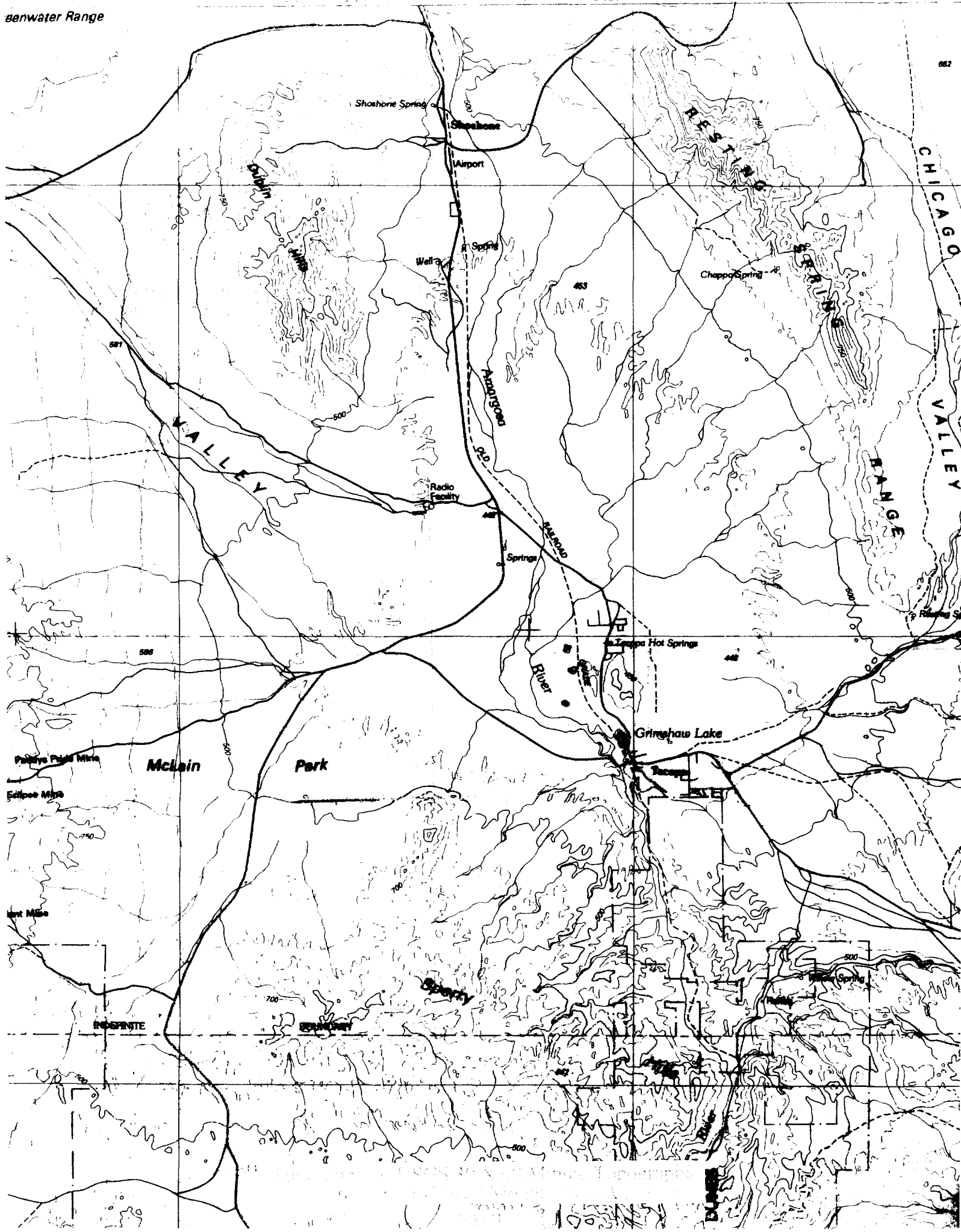


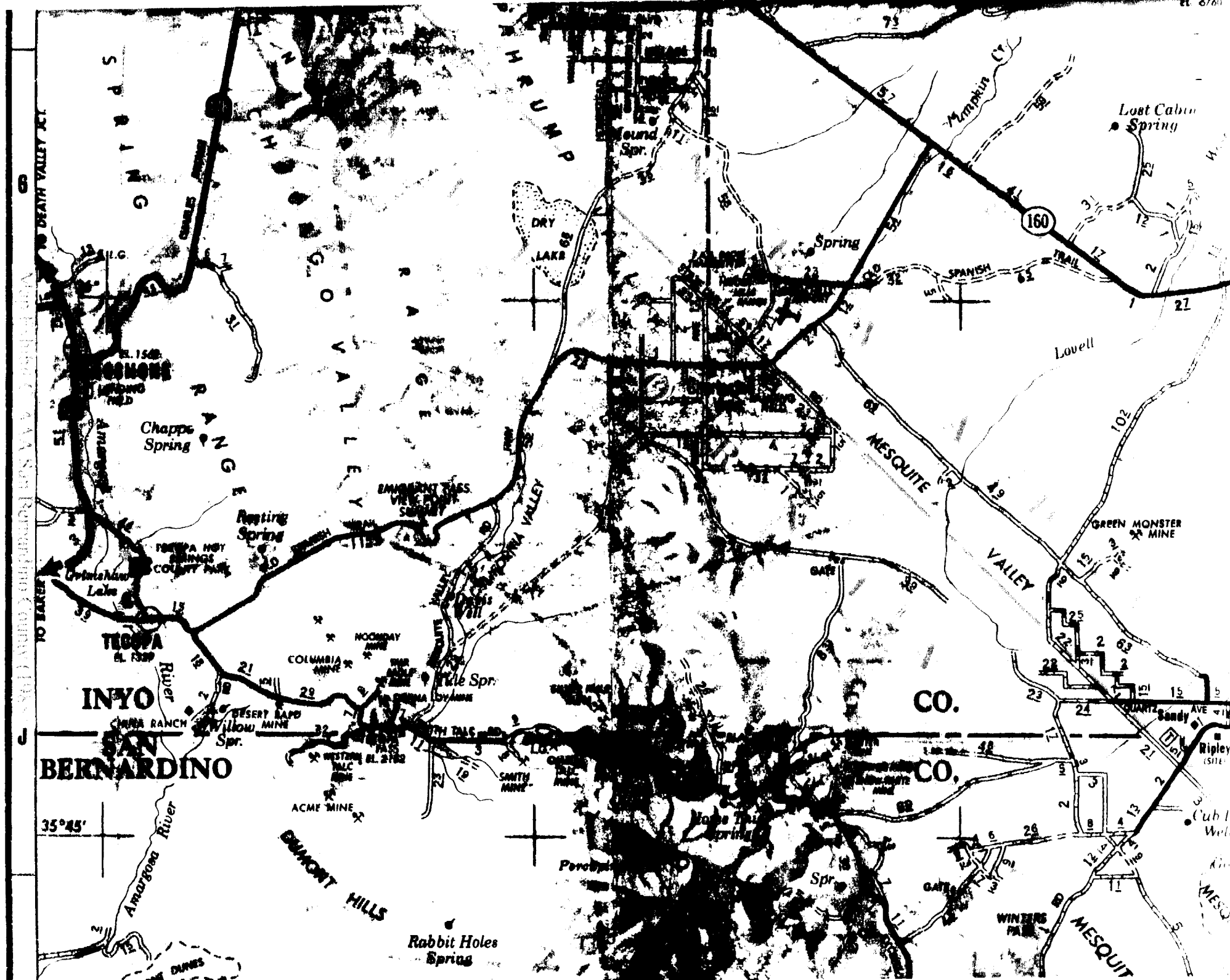
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BROWN PK  
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NOPAH

RESTING SPRING

BROWN

CHARLES

CHICAGO

RANGE

AMARGOSO

178 Shoshone  
EL. 1589

SHOSHONE AIRPORT

HWY.

FURNACE CR. WASH. RD.

EL. 1400  
Tecopa  
Hot Sprs.

Tecopa  
EL. 1329

OLD

FURNACE CR. WASH.

River

EL. 2090  
MBEX PASS

127

WESTERN TALC. RD.

SMITH TALC. RD.

MESQUITE VALLEY RD.  
CALIFORNIA VALLEY

DUMONT DUNES RD.

Salt

Kingston

Valjean  
EL. 1020

AVAWATZ

Map of Inyo Co. AA Death Valley National Monument  
PAGE 11 Inbo



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## QUESTIONNAIRE SUMMARY

On March 8, 1999, Hodson Broadcasting developed a local resident questionnaire for area citizens in or near Tecopa, California. This questionnaire's purpose was twofold: to help enlighten the Federal Communications Commission with viewpoints of Tecopa residents regarding the current community status issue before the Commission, and to provide to these same residents an informal comment venue without having to actually respond to the Commission's *Notice of Proposed Rule Making*.

On March 11, 1999, Hodson Broadcasting distributed fifty copies of this questionnaire (a copy of such is attached with this summary on the following two pages) in the general Tecopa area, including Tecopa Heights and Tecopa Hot Springs. The questionnaire circulated for over 2 weeks to afford adequate local opportunity for any who desired to express themselves to do so.

On March 27, 1999, Hodson Broadcasting collected and evaluated all completed and returned questionnaires. Twelve percent (six of fifty) responded by the deadline date of March 26. Respondents are categorized below:

<u>NAME</u>	<u>P.O. BOX/ADDRESS</u>	<u>DATE SIGNED</u>
Robert E. Barbee	262	3/11/99
Bonnie Brown	#1 Date Palm Lane	3/15/99
Brian Brown	#1 Date Palm Lane	3/15/99
Harold J. DuMond	491	3/13/99
Vivian L. DuMond	491(Delight's Hot Spa)	not signed
Arthur B. Goans	76	3/13/99

It should be noted that the Browns and the DuMonds are related by marriage. The DuMonds answered separately, while the Browns, owners of the China Ranch Date Farm, chose to respond utilizing one survey form.

Summarization of Question 2, "Do you consider Tecopa, California, as a *"community"?*"(italics added). One hundred percent (100%) responded "yes" to this question. As a side note, it is worth mentioning that everyone (another two dozen permanent and/or seasonal Tecopa residents which did not participate in the questionnaire) Hodson Broadcasting verbally surveyed concerning community status, affirmatively concluded that they regarded Tecopa as a community.

Summarization of Question 3 concerning length of residency. All respondents checked the "over 5 years" option except Mr. Goans, who stated he has been in the area for 2 to 5 years.

Summarization of Question 4, the residency reason. All respondents, except the Browns, noted the "hot springs benefits" option. "Favorable weather" and "retirement" were also cited by both DuMonds and Mr. Goans. Mr. Barbee chose the "mineral/mining" selection as his second pick, while the Browns only checked "other" under this inquiry. It is deduced that from the comments the Browns gave, the "other" for them refers to their business and associated land as their cause for being in the Tecopa region.

Summarization of Question 5, the common interest/coalesce query. All respondents, except the Browns, replied "yes". Again, this further demonstrates the Browns interests in the area differ from others due to their date farm business.

Question 6 allows for general open/other comments regarding their feelings about Tecopa as a community and/or common coalesce in the Tecopa area. Mr. Barbee and Mrs. DuMond left this field blank. Because Vivian's dated signature was also absent from the second page, Hodson Broadcasting is assuming that she may have inadvertently skipped or forgot page two of the survey. Mr. Goans offered the most relevant comments in his declaration: "I would define Tecopa as a community because, although we have a post office, store, laundry and restaurant(,) we are not incorporated as a city or town." The Browns stated simply: "We own property in the area(.)", while Mr. DuMond commented: "I would the weather report hourly", without further explanation as to his avowal's incompleteness.

End of summary.

## Hodson Broadcasting's Local Resident Questionnaire

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Please take a moment and answer the following questions by checking the response that most closely identifies you. Some questions may require answers more detailed than a simple "yes" or "no". In such instances, be as complete as possible in your statements. Do not skip over or leave blank any questions. Type or LEGIBLY PRINT (in black ink) your responses so that they will be correctly interpreted. If there is any additional information that you would like to include, that you couldn't due to space, please attach it on a separate sheet of paper and then submit the extra comments along with this form.

To participate in this questionnaire, you **MUST** be a local resident of Tecopa, California. The purpose of this survey is to receive input from area citizens to determine if and how they view Tecopa as a community. Completed questionnaires will **ONLY** be used as exhibit testimonials for a Federal Communications Commission decision which involves Tecopa and Hodson Broadcasting. Otherwise, the information that you give will remain confidential and your name will **NOT** be placed on various business mailing lists nor utilized for any type of solicitation purposes.

Mail or hand-deliver this completed questionnaire to: **Hodson Broadcasting, Post Office Box 66, Tecopa, California 92389-0066**. All returned responses must be received by Friday, March 26, 1997, to be considered for submission in the above-mentioned FCC proceeding.

Thank you for your participation in this very important survey.

-----

1. What is your name and address? \_\_\_\_\_

\_\_\_\_\_  
Tecopa, California 92389

2. Do you consider Tecopa, California, as a "community"?    ☐ YES    ☐ NO

3. How long have you considered yourself a Tecopa resident?

☐ less than one month    ☐ 1 to 6 months    ☐ 6 to 12 months  
☐ 1 to 2 years    ☐ 2 to 5 years    ☐ over 5 years

4. What is the reason you chose Tecopa as your place to call home? (Check all that apply)

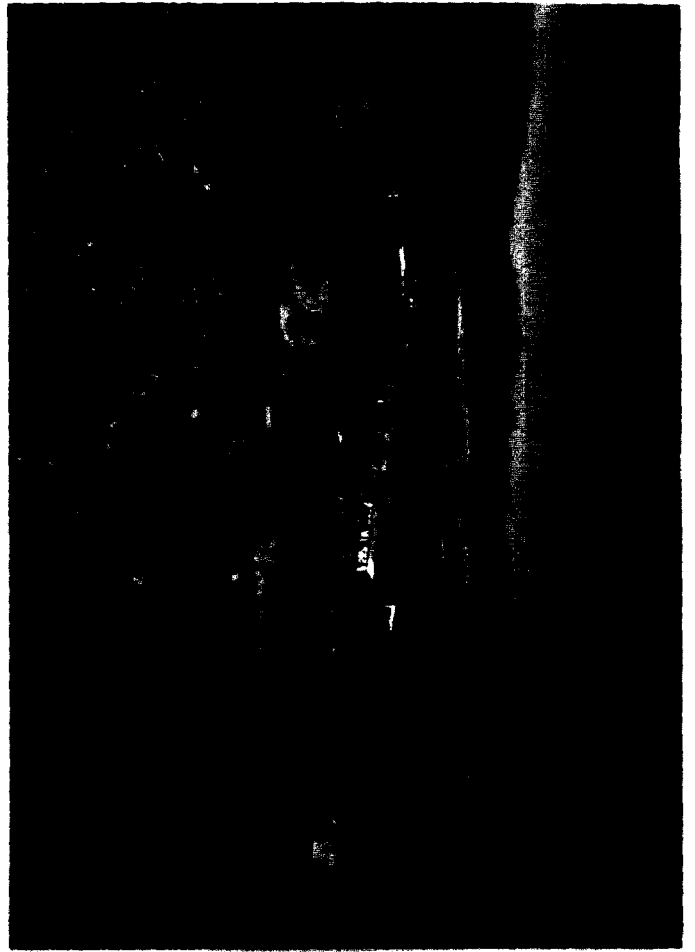
☐ favorable weather    ☐ hot springs benefits    ☐ medical reasons  
☐ retirement    ☐ mineral/mining    ☐ other (specify)

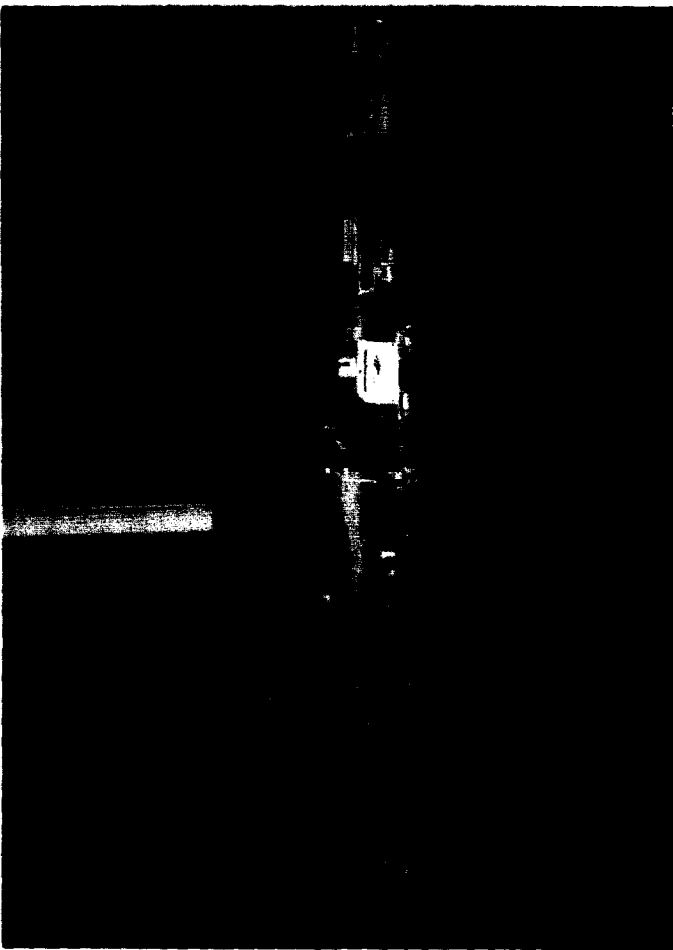
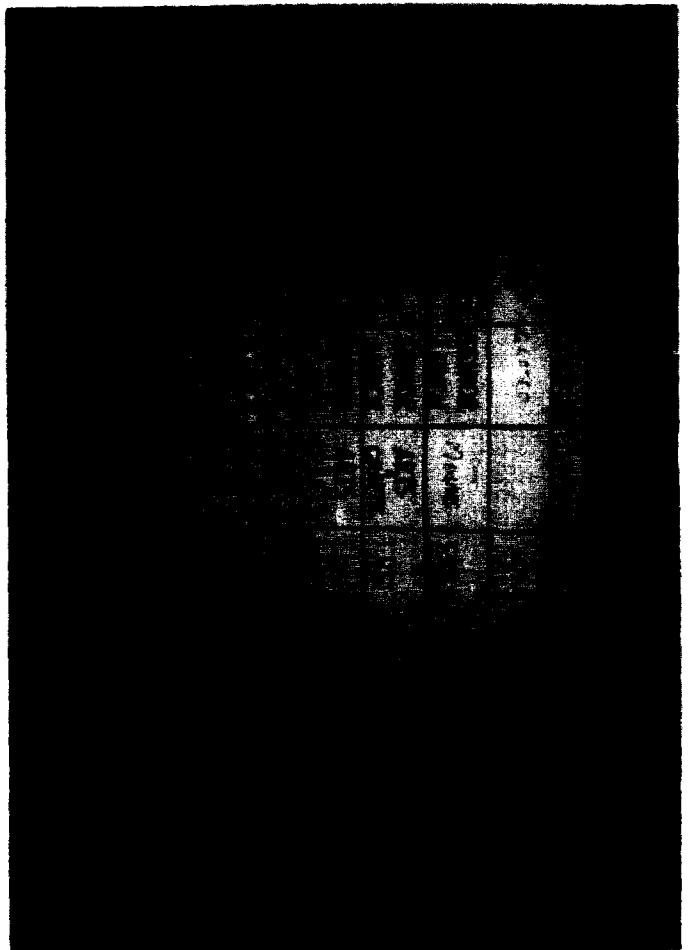
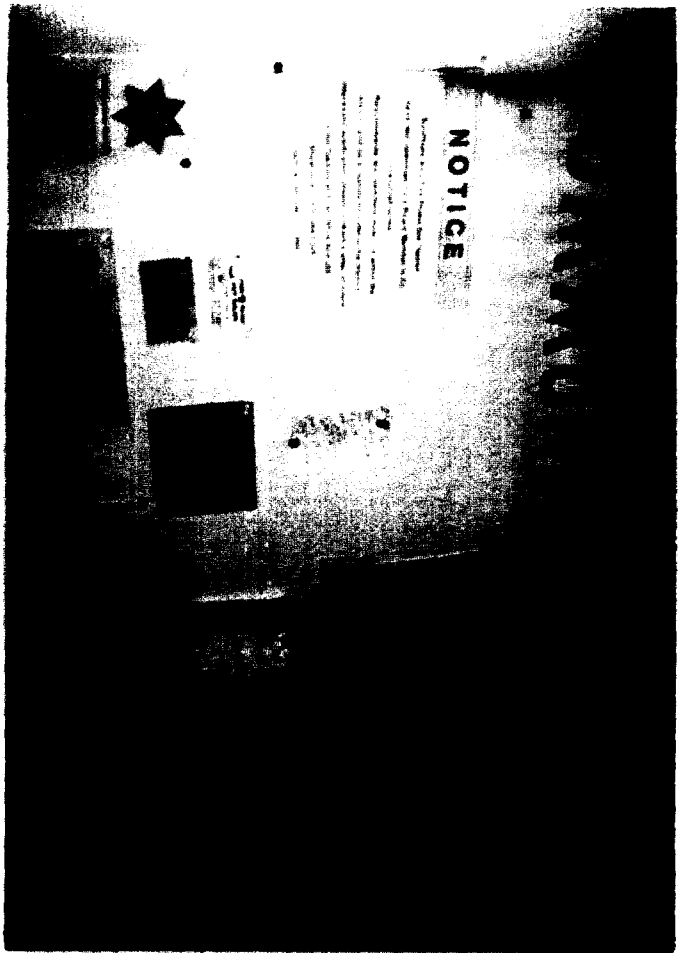
5. Do you feel there is common interests between you and other Tecopa residents that would similarly draw you to this area?    ☐ YES    ☐ NO

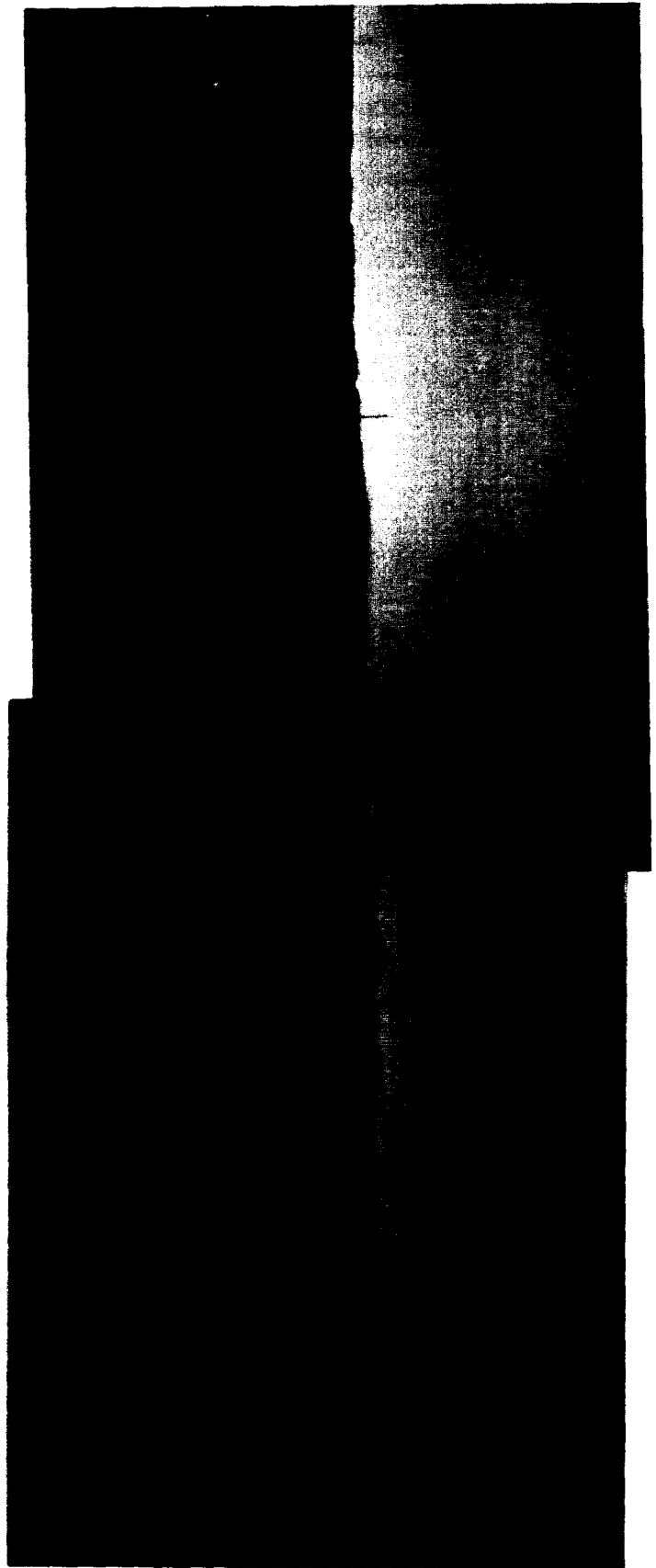
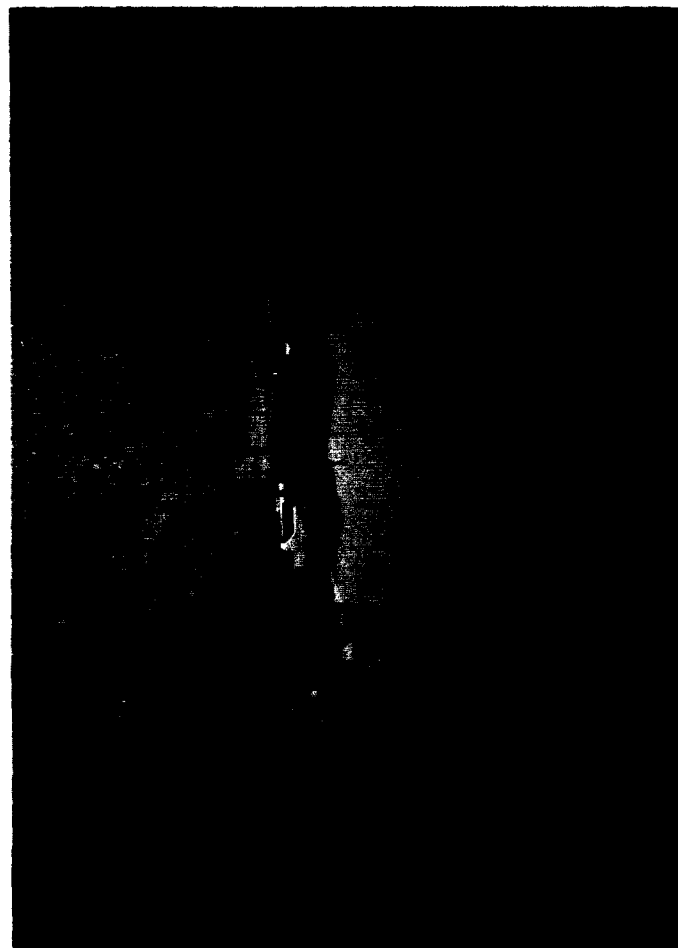
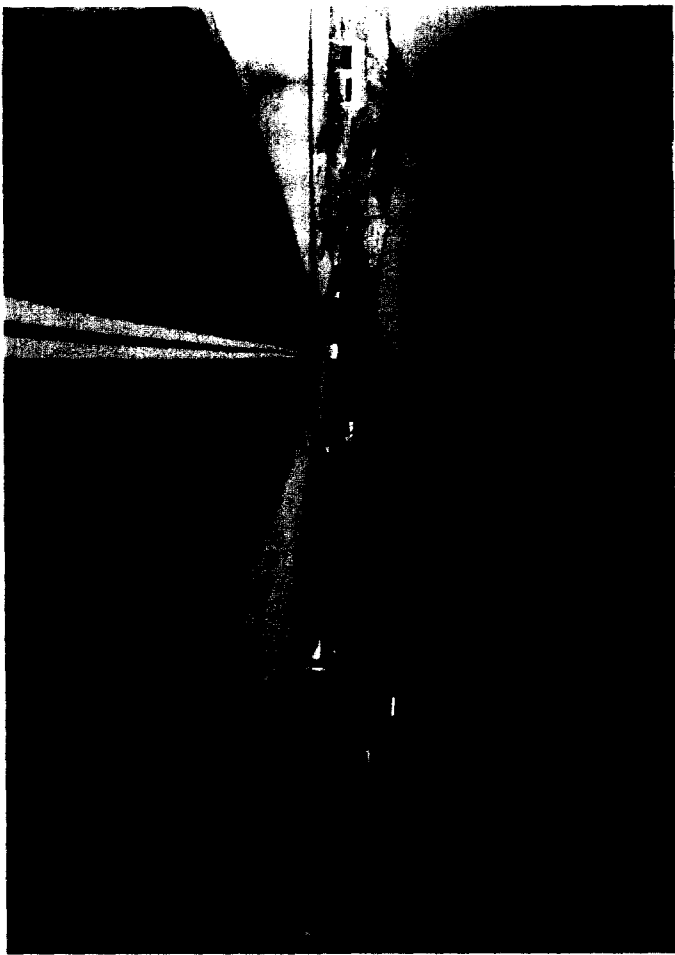


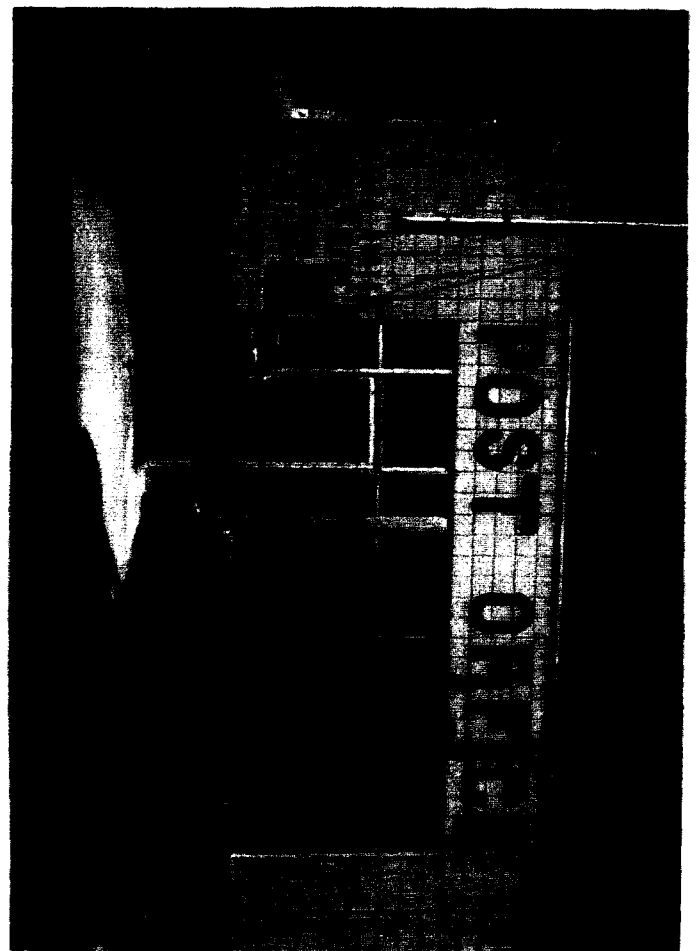
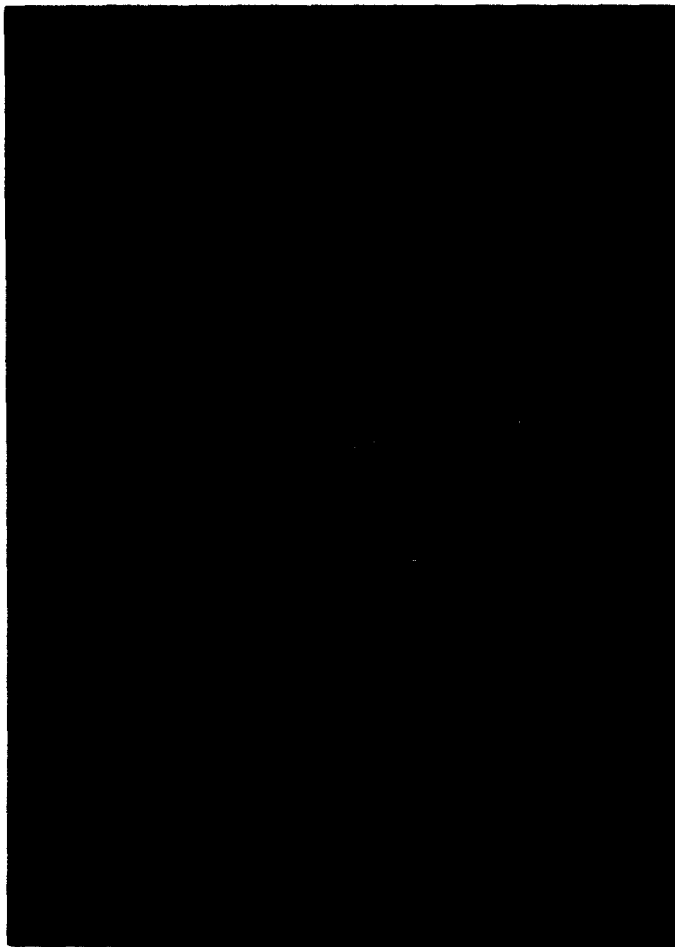
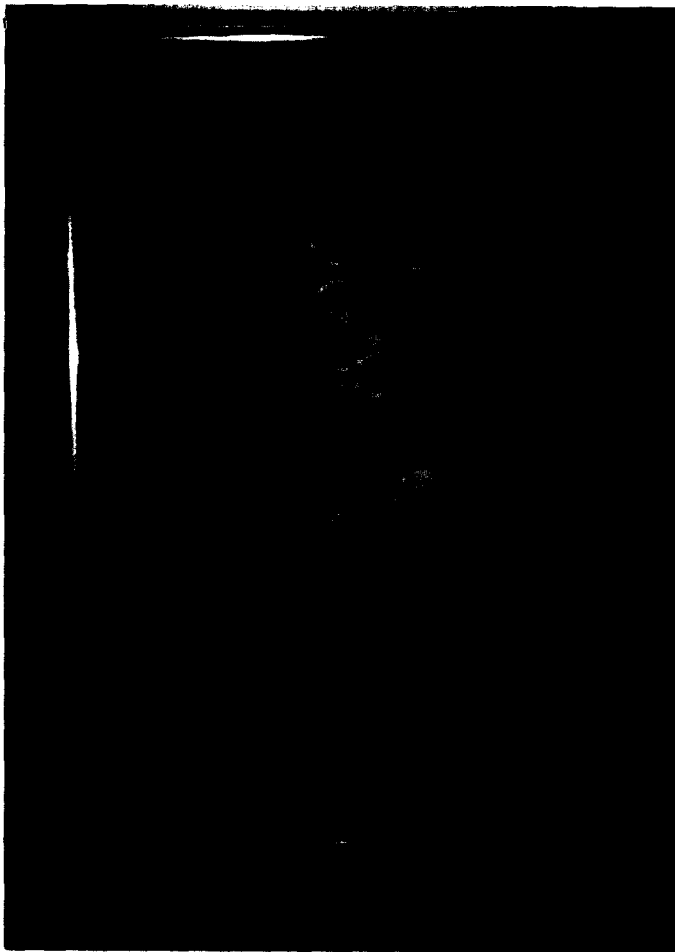
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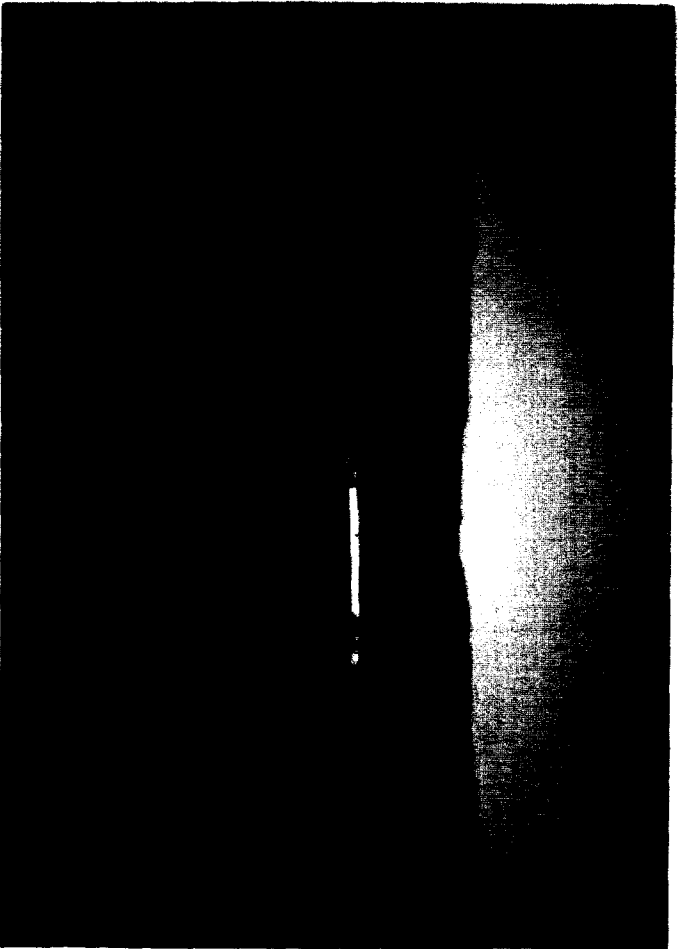
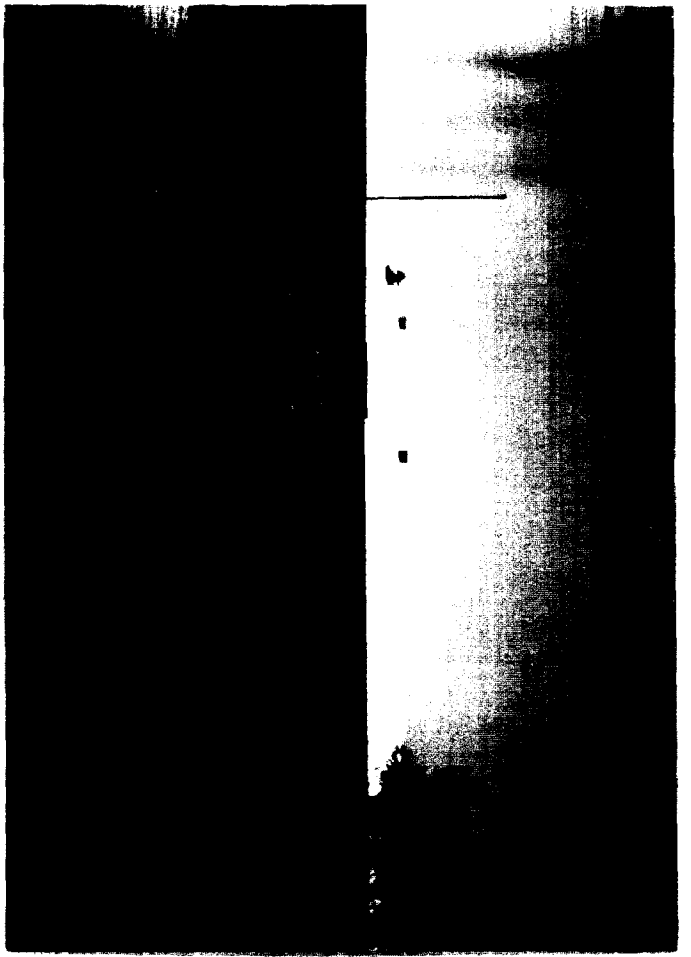
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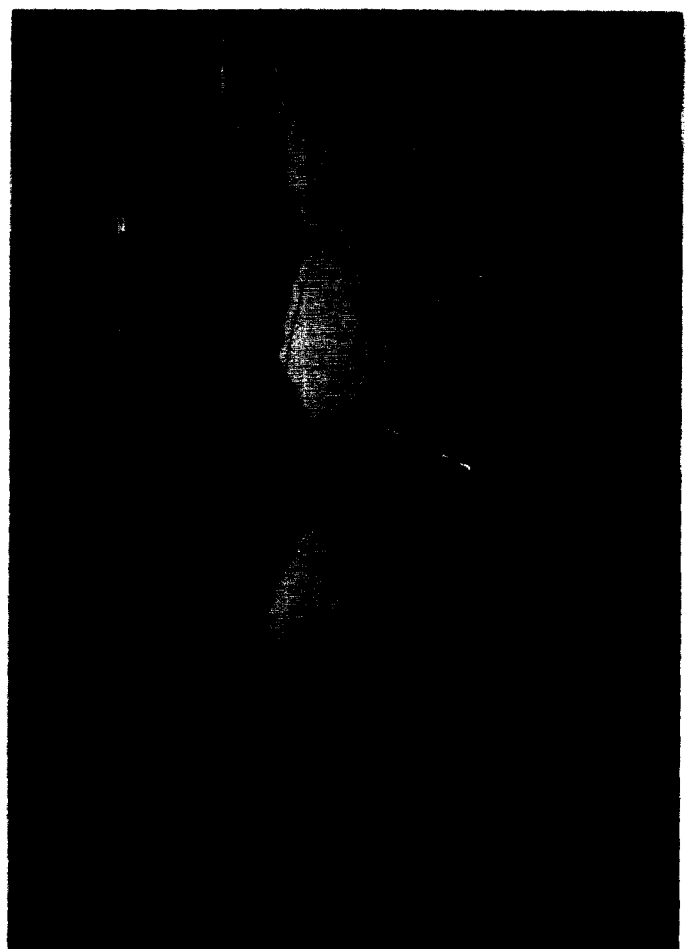
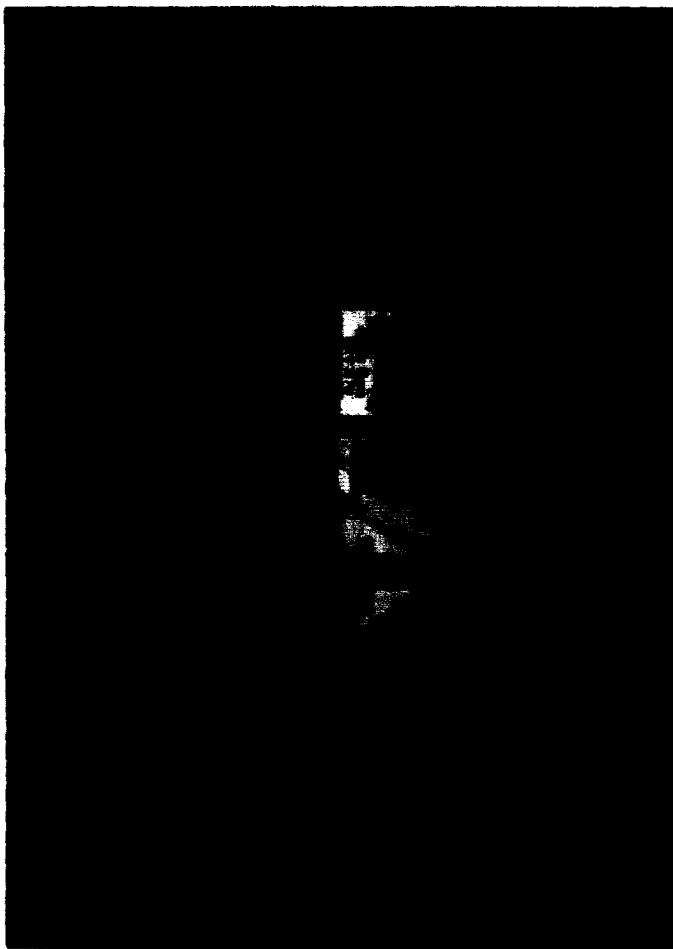


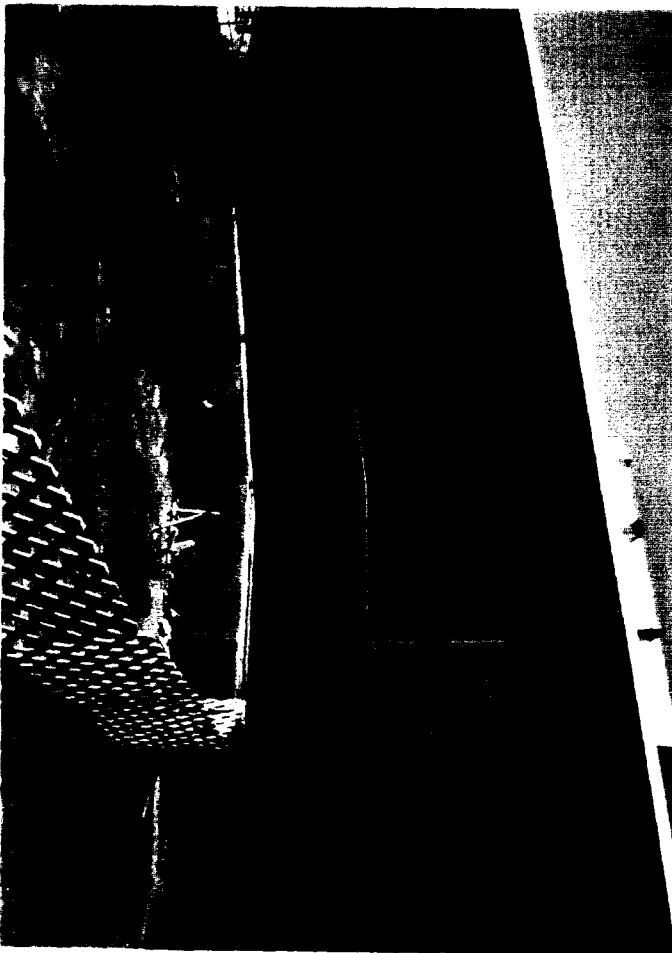




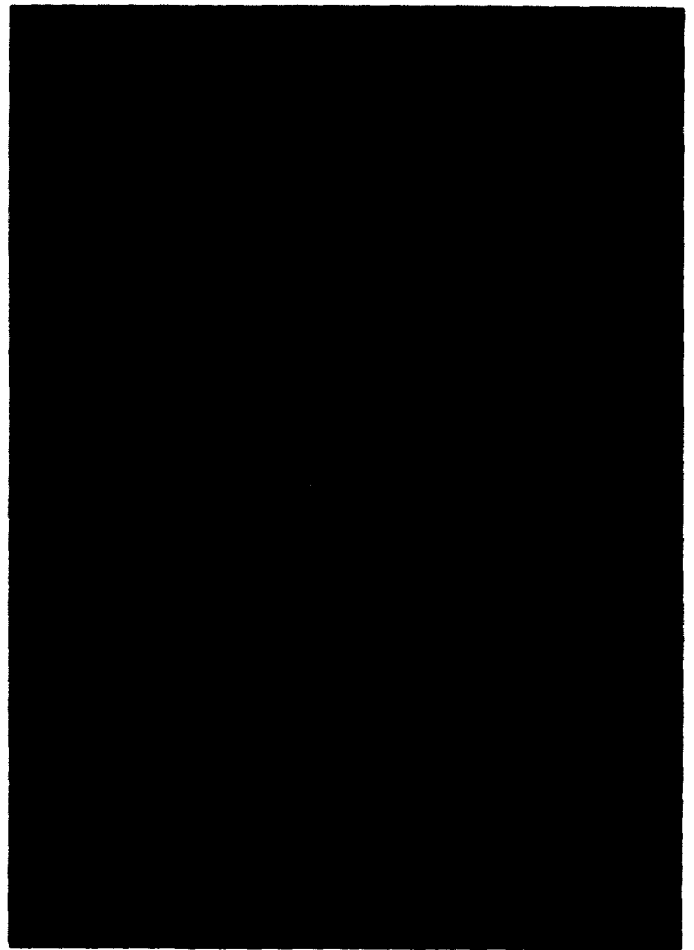
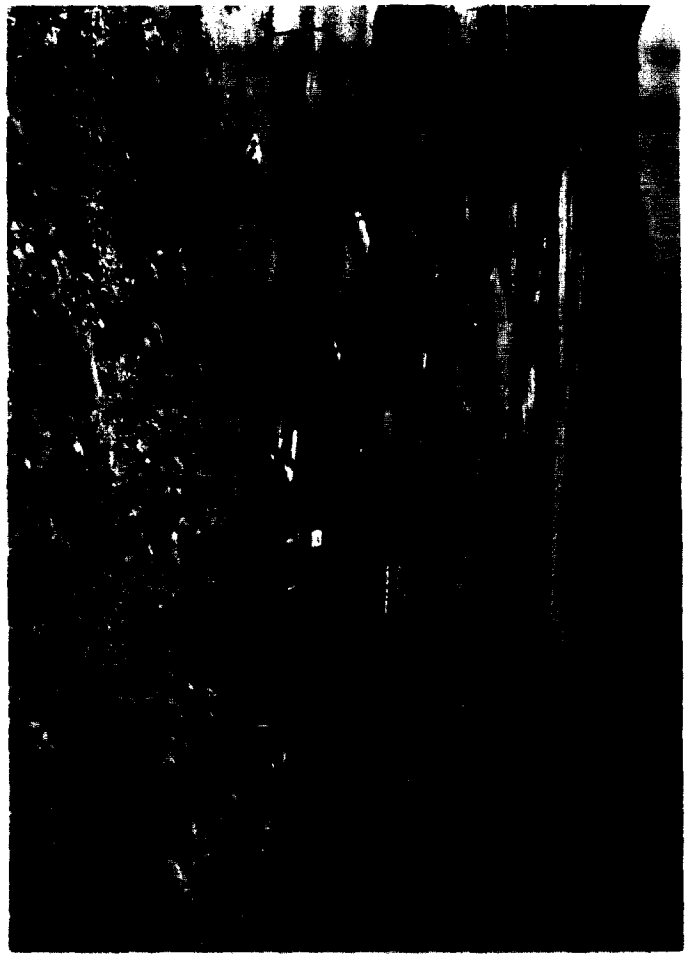












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